Re: 04-140

Dear Reviewer,

In general, I support ARRL's petition for changes to HF Frequency Privileges. However I believe their proposed 25 kHz expansion of phone privileges on the 75/80 meter band is inadequate, will offer negligible relief from overcrowding and overlooks a timely opportunity to address the longstanding issue of spectrum under-utilization in the 3500-3750 kHz frequency segment.

In its discussion denying another petitioner's request for segmentation by mode/bandwidth on 160 meters, FCC indicated support for amateur frequencies having the flexibility to accommodate growing/changing operating interests and activities while avoiding the inefficiency of under-used spectrum preserved for modes of diminished interest. The existing 80 meter band plan is a vivid example of inefficient spectrum utilization.

I was originally licensed in 1962. Since then, most of my operating activities have been within the 3.5-4.0 MHz spectrum, using various modes. Without hesitation, I submit that 80 meters is and has been under-utilized for decades. When making my own analysis of spectrum use during prime propagation periods in fall and winter during night hours, I can often tune through 100 kHz without locating a signal. On occasions of nominal activity, I typically find total band occupancy by US amateurs equal to approximately 5 kHz or two-percent of the available 250 kHz. Exceptions are during DX pileups, primarily in the extra cw sub band, and during contests. In recent years I note a recurring pattern with respect to major cw contests where spectrum use is confined to 3500-3580, or approximately 32 percent of available 80 meter spectrum. Meanwhile, regular ongoing activity on the adjacent 75 meter phone/image allocation produces heavy band loading, often to the extent of over crowding.

When organizations or individuals petition for changes to amateur frequency privileges, FCC is frequently asked to endorse philosophies centered on presumptions that some modes of emission have greater merit than others. I appreciate the fact that the Commission recognizes authorized modes to be authorized modes, nothing more and nothing less. 80 should no longer be structured as a preservation for the hopeful return of narrow-bandwidth modes that abandoned it decades ago; nor should vast,disproportionate spectrum resources continue to be set aside in anticipation of unknown future use by unknown future modes with unknown viability. Whether the 80 meter band plan is in its present state because of philosophy or neglect, it perpetuates quiet islands of spectrum that are conspicuous by their silence.

I ask the Commission to expand the 80/75 meter phone/image allocation to include 3600–4000 kHz and instruct the petitioner to resubmit a plan for access to those privileges by license class.

As an alternative there is merit in deregulation of band segmenting by emission bandwidth or mode, with reliance on gentlemen's agreements to avoid cross-mode interference; and reliance on the amateur service to achieve optimum spectrum utilization under prevailing real-time conditions of propagation and band activity. The agreement on 160 meters allocates a 43 kHz set-aside for narrow-bandwidth modes or 21.5 percent of available spectrum. If a similar model were applied to 3.5-4.0 MHz, the result would be a narrow-mode set-aside of 105 kHz, presumably in the 3500-3605 kHz frequency segment.

Respectfully submitted,

Michael K. Wingfield
W8MW